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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

CASE NO.: 2:15-cr-00255-JAD-PAL

11 Plaintiff;

12 vs.
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**STIPULATION TO CONTINUE
DEADLINE TO FILE OBJECTIONS TO
REPORT AND RECOMMENDATION
AND PROPOSED ORDER**

PAUL ENGSTROM, et al.,

(First Request)

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Susan Cushman, Assistant United States Attorney, counsel for the United States of America, and Kathleen Bliss, counsel for Paul Engstrom, that the current deadline of March 19, 2016, in which Defendant must file his objections to Magistrate Judge Leen's Report and Recommendation on Defendant's Motion to Suppress be extended for thirty (30) days. This stipulation is entered into based upon the following:

1. Defendant Paul Engstrom ("Defendant") was charged by way of indictment on September 9, 2015, with one count of conspiracy to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(C), and one count of possession with intent to distribute a controlled substance, in violation of

1 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C). *See docket # 15.*

- 2
- 3 2. Defendant filed his Motion to Suppress on December 22, 2015. *Docket # 43.*
- 4 3. Magistrate Judge Peggy Leen held a hearing on Defendant's Motion to Suppress on
- 5 February 12, 2016 (*docket # 57*) and issued her Report and Recommendation to deny
- 6 Defendant's Motion on March 2, 2016 (*docket # 58*).
- 7 4. Defendant's Objections to Judge Leen's Report and Recommendation are currently due
- 8 by March 19, 2016. *Id.*
- 9 5. Defendant remains in custody at the Nevada Southern Detention Center in Pahrump,
- 10 Nevada, pending trial. Defendant's custodial status makes it more difficult for counsel
- 11 and Defendant to communicate regarding his case, the decisions of the Court, and
- 12 strategy moving forward.
- 13 6. Counsel for Defendant ordered the transcript of the suppression hearing on an
- 14 expedited basis as said transcript is necessary for preparation of his Objections to the
- 15 Report and Recommendation. Counsel received this transcript today.
- 16 7. In light of the above, the process of obtaining this transcript, reviewing it, meeting with
- 17 Defendant to discuss, and drafting the Objections cannot reasonably been done before
- 18 the current deadline of March 19, 2016.
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- 1 8. Based upon the foregoing, counsel for Defendant and the government hereby stipulate
2 and agree to extend the deadline within which Defendant must file his Objections to
3 the Report and Recommendation by thirty (30) days. Defendant shall file his
4 Objections on or before April 21, 2016.
- 5 9. This Stipulation is entered into in good faith and not for purposes of delay.
6

7 Dated this 14th day of March 2016.
8

9 */S/ Susan Cushman*

10 Susan Cushman
11 Assistant United States Attorney
12 Attorney for the United States

13 */S/ Kathleen Bliss*

14 Kathleen Bliss, Esq. of
15 Kathleen Bliss Law PLLC
16 Attorney for Defendant Paul Engstrom

17 **ORDER**

18 Based upon the stipulation of counsel for the United States and for the Defendant, and
19 good cause appearing, it is hereby ORDERED that the current deadline in which Defendant must
20 file his Objections to Magistrate Judge Leen's Report and Recommendation on Defendant's
21 Motion to Suppress is extended to April 21, 2016.

22 **IT IS SO ORDERED:**

23 
United States District Judge

24 DATED: March 14, 2016

1 **CERTIFICATE OF SERVICE**

2 In accordance with Rule 49(c) of the Federal Rules of Criminal Procedure and Rule 47-
3 11 of the Local Rules of Practice of the United States District for the District of Nevada, I certify
4 that I am an employee of KATHLEEN BLISS LAW PLLC, and that on this 14th day of March,
5 2016, I did cause a true copy of:

6 **STIPULATION TO CONTINUE DEADLINE TO FILE OBJECTIONS TO REPORT
7 AND RECOMMENDATION AND PROPOSED ORDER**

8 To be served via electronic service by the U.S. District Court CM/ECF system to the parties on
9 the Electronic Filing system in this action.

10 By: */s/ Sylvia Bishai* _____
11 An employee of
12 KATHLEEN BLISS LAW PLLC

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